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August 3, 2022

Via ECF

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Bermudez, et al. v. Colgate-Palmolive Co.*, Case No. 1:21-cv-10988-KPF

Dear Judge Failla:

Pursuant to Your Honor's Individual Rules of Practice in Civil Cases, the Parties hereby jointly request and stipulate to the proposed amended schedule below.

The deadline for Defendant to file its Motion to Dismiss is August 15, 2022; the deadline for Plaintiffs to file their Opposition is September 29, 2022; and the deadline for Defendant to file its Reply is October 25, 2022. Dkt. 19. Given the additional plaintiffs and claims presented in the First Amended Complaint, as well as personal and professional obligations, the Parties request that the Court adopt the stipulated briefing schedule as set forth below, which represents a two-week extension of the current deadlines.

- (1) The deadline for Defendant to file its Motion to Dismiss will be August 29, 2022.
- (2) The deadline for Plaintiffs to file their Opposition will be October 13, 2022.
- (3) The deadline for Defendant to file its Reply will be November 8, 2022.

This is the Parties' second requested extension. *See* Dkt. 18.

A proposed Order pursuant to Your Honor's Individual Rule of Practice 2(D) is attached. The Parties appreciate the Court's continued attention to this matter.

KIRKLAND & ELLIS LLP

Hon. Katherine Polk Failla
August 3, 2022
Page 2

Respectfully submitted,

s/ Robyn E. Bladow

Robyn E. Bladow, Attorney for Defendant

s/ Jonathan Shub

Jonathan Shub, Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FELIX BERMUDEZ, KIMBERLY
RICHARDSON, TERRI CORPREW,
ROBERT SUMRELL, HECTOR
GONZALEZ, HAROLD NYANJOM , and
KELLIE NYANJOM, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE COMPANY,

Defendant.

Case No. 1:21-cv-10988-KPF

**[PROPOSED] ORDER GRANTING THE
PARTIES' STIPULATION TO EXTEND
THE BRIEFING SCHEDULE FOR
DEFENDANT'S MOTION TO DISMISS**

**[PROPOSED] ORDER GRANTING THE PARTIES' STIPULATION TO EXTEND THE
BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS**

Having reviewed the Parties' Joint Letter requesting the Court extend the Parties' stipulated briefing schedule, the Parties' stipulation is hereby GRANTED.

1. The current deadlines for the briefing schedule regarding Defendant's Motion to Dismiss are vacated;
2. Defendant will file its Motion to Dismiss by August 29, 2022;
3. Plaintiff will file their Opposition to the Motion to Dismiss by October 13, 2022;
4. Defendant will file its Reply in support of the Motion by November 8, 2022.

SO ORDERED.

Hon. Katherine Polk Failla
United States District Judge

Dated: August __, 2022